

From: [Elizabeth Perez](#)
To: [Brian Pollock](#)
Cc: [Juan Aragon](#); [Michael Kaufman](#)
Subject: RE: Valdivieso Figuera vs. All VIP Care - Proposed Docs
Date: Thursday, September 26, 2024 11:14:00 AM
Attachments: [image001.png](#)
[image002.png](#)

Brian,

I just called you but it went to vm. there is a glaring problem with your writ. It is not based on a final judgment. See [Pineiro v. Am. Express Card Servs. Co., 105 So. 3d 614, 2013 Fla. App. LEXIS 570 \(Fla. 4th DCA 2013\).](#)

You need to withdraw it immediately, do whatever you need to do to undo the funds being frozen because this is disrupting my client's business. If you do not proceed to withdraw it immediately, we will file our Emergency Motion To Dissolve the Writ, and a 57.105 notice to you.

Sincerely,

Elizabeth P. Perez, Esq.

Partner

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Exhibit A